

214-08/MEU

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

08 CV 3620 (RMB)

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VARDHMAN SHIPPING PVT LTD.,

Plaintiff,

-against-

HERNING SHIPPING AS,

Defendant.
-----X

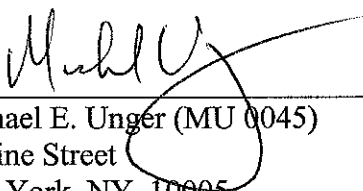
**NOTICE OF MOTION FOR
RECONSIDERATION OF OR RELIEF
FROM ORDER DIRECTING
COUNTER-SECURITY BE POSTED**

PLEASE TAKE NOTICE that pursuant to F.R.C.P. Rule 59 (e), and upon the annexed Declaration of Saurin Shah dated June 24, 2008, and upon all the prior pleadings and proceedings in this matter, Plaintiff VARDHMAN SHIPPING PVT LTD. will move this Court at the United States District Court for the Southern District of New York, Courtroom 21A, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on July ___, 2008 at __:___ or as soon thereafter as counsel may be heard, to reconsider and/or provide relief from the Court's Order of June 10, 2008 which granted the motion of Defendant HERNING SHIPPING AS to and directed VARDHMAN to post counter-security in favor of HERNING, and for such other, further and different relief as the Court may deem just and appropriate in the premises.

Dated: New York, New York
June 24, 2008

FREEHILL HOGAN & MAHAR, LLP
Attorneys for Plaintiff
VARDHMAN SHIPPING PVT LTD.

By: _____


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